

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ATLANTICA HOLDINGS, INC., BALTICA
INVESTMENT HOLDING, INC., BLU FUNDS,
INC., Allan KIBLISKY, Anthony KIBLISKY, and
Jacques GLIKSBERG,

Plaintiffs,

- against -

SOVEREIGN WEALTH FUND "SAMRUK-
KAZYNA" JSC,

a/k/a "National Welfare Fund 'Samruk
Kazyna,'"

Defendant.
----- X

No. 12-CV-8852 (JMF)

**DEFENDANT SOVEREIGN WEALTH FUND "SAMRUK KAZYNA"
JSC'S NOTICE OF MOTION TO DISMISS THE AMENDED COMPLAINT**

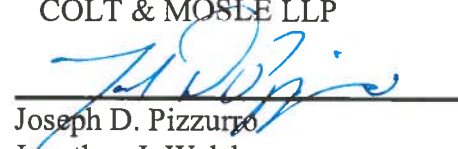
PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of Defendant Sovereign Wealth Fund "Samruk Kazyna" JSC's Motion to Dismiss the Amended Complaint; the Declaration of Francis Fitzherbert-Brockholes dated May 1, 2013 with the Exhibits thereto; and the Declaration of Joseph D. Pizzurro dated May 6, 2013 with the Exhibits thereto, Defendant Sovereign Wealth Fund "Samruk Kazyna" JSC, by its undersigned counsel, will move this Court before the Honorable Jesse M. Furman at the Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 1105, New York, New York, 10007, for entry of an Order dismissing, with prejudice, the Amended Complaint in this matter, pursuant to Federal Rules of Civil Procedure 12(b)(1) for lack of subject matter jurisdiction, 12(b)(2) for lack of personal jurisdiction, 12(b)(6) for failure to state a claim, and 9(b) and the Private Securities

Litigation Reform Act ("PSLRA"), 15 U.S.C. § 78u-4(b)(1)-(3)(A) for failure to plead fraud with particularity.

Dated: May 6, 2013
New York, New York

Respectfully submitted,

CURTIS, MALLET-PREVOST,
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